

Eastern Sierra Fire Restoration and Maintenance Project

Response to Scoping Comments

The Inyo National Forest initiated public scoping on November 22, 2019 for the Eastern Sierra Fire Maintenance and Restoration Project. Six comments were received between November 30, 2019 and January 6, 2020. The following tables were generated to capture public comments and responses to comments provided by the project interdisciplinary team. The Forest greatly appreciates the time and effort put into comments received.

Table 1. Individuals and organizations that provided comments to the draft proposed action.

Letter ID	Timely	First	Last	E-mail Address	Organization	Date	Note
1	Yes	Peter	Norquist	norquist@pobox.com	NA – private citizen	11/30/2019	
2	Yes	Lewis	Jones	ljonesmammoth@gmail.com	NA – private citizen	11/29/2019	
3	Yes	Jane	Kenyon	bcskierjane@gmail.com	NA – private citizen	1/3/2020	
5	Yes	Paul	McFarland	pmcfarland395@gmail.com	Jeffrey Pine Associates	1/6/2020	
4	Yes	Jora	Fogg	jora@friendsoftheinyo.org	Friends of the Inyo	1/6/2020	Commented with Sierra Forest Legacy
4	Yes	Jamie	Ervin	jamie@sierraforestlegacy.org	Sierra Forest Legacy	1/6/2020	Commented with Friends of the Inyo
6	Yes	Craig	Thomas	craigthomas068@gmail.com	Fire Restoration Group	1/6/2020	

Table 2. Comments received and Inyo National Forest responses.

LETTER ID	COMMENT ID	COMMENT CODE	CATEGORY	ISSUE	COMMENT	RESPONSE
1	1	10.2	NEPA	Consensus	This is good news. You have my 100% support.	Thank you for supporting this project.
2	2	10.2	NEPA	Consensus	I support this project as it's presented. I think a project of this type is perfect for our area	Thank you for supporting this project.
3	3	17.1	Wildlife	Design Criteria/Management Requirement	Please do the prescribed burns outside of songbird nesting season. Songbirds are not being successful in Mammoth Lakes with the overpopulation of Corvid...The numbers of ravens and jays are so huge here and songbirds are declining. Please don't do the prescribed burns when the songbirds are nesting primarily June and July, as I saw happenning in Summer 2019.	To achieve project objectives this project burning may occur in any season and the project will include plan components for songbirds such as; TERR-FW-DC-06 will provide for ground nesting, shrub nesting, and cavity nesting birds. All incidental sightings of bird nests will be buffered and documented. Also, SPEC-FW-STD-01 applies here - "Design features, mitigation, and project timing considerations are incorporated into projects that may affect occupied habitat for at-risk species."

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4	4	10.2	NEPA	Consensus	We are strong advocates for expanding fire restoration across the Sierra Nevada and welcome the opportunity to comment on this innovative approach to restoring fire to the Inyo National Forest on a landscape scale	Thank you for supporting this project.
4	5	10.3	NEPA	Laws and Regulations	The Proposed action would benefit from a discussion of how the project goals fit into use of this CE.	The Decision Memo includes information about why the CE category is appropriate.
4	6	8.2	Implementation	Public Involvement	The use of CEs..limit public involvement...we strongly recommend general announcements for spring and fall burns, as well as annual public field trips to previous and upcoming project sites. Field trips will help integrate the community in prescribed fire and move the needle on social acceptance of living with fire.	The Inyo National Forest agrees that continued public involvement in this project is essential. The project's interdisciplinary team is drafting an implementation plan that describes the different stages of project implementation and roles and responsibilities of the public, tribes, cooperating agencies and cooperative groups. Field trips to treated and untreated sites may occur as part of this process, the timing of which will depend on staffing. All prescribed burns on the Inyo National Forest are announced through press releases.
4	7	8.2	Implementation	Public Involvement	Given the use of a forest-wide Categorical Exclusion we want to make sure the public is notified and has the ability to provide feedback to the Forest through the next iterations of this project	The Inyo National Forest began drafting an implementation plan for this project in August 2019. This plan includes external involvement (cooperative agencies, collaborative groups, tribes, the public), treatment prioritization criteria, and monitoring plan components and guidelines. The intent of the monitoring plan is to learn from treatment outcomes and improve the project over time. The project implementation plan will be posted to the project website in the near future.
4	8	7.1	Fire and Fuels	Analysis	Overall, the scoping document does not contain a level of detail necessary for a comprehensive review of the project's impacts and implications on the Forest. For example, the scoping document notes that the forest will complete an analysis for prescribed fire potential across the project area but does not include what such an analysis will consider and if it will be available to the public. We recommend making this report and other subsequent documents available on the project webpage.	Multiple GIS layers that characterize vegetation and vegetation type potential across the Inyo were used to develop a target vegetation model for this project. This model depicts the potential extent where prescribed fire may be implemented across the Inyo National Forest. Results of this model indicate the Inyo and White Mountain Ranges lack vegetation types that historically experienced high to moderate frequency fire. The interdisciplinary team will use this model to assess project effects to forest resources.

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4	9	8.6	Implementation	Prioritization	...places previously treated for fuels reduction should be prioritized for managed wildfire and first entry fire.	The Inyo National Forest Land Management Plan (2019) includes allows for multiple objective fire management strategies, including resource management and areas recently treated for fuels reduction. This project aims to maintain fire regimes in target vegetation types that have recently been treated for fuels reduction and where these vegetation types are within the natural range of variability. First entry prescribed fire is the preferred treatment tool to meet desired conditions and will be used where vegetation & fuel conditions will achieve this goal.
4	10	7.2	Fire and Fuels	Prescription	The forest plan allows for wildfires to be managed for resource benefit in the wildfire maintenance and restoration zones outside of designated wilderness. Since most of the maintenance and restoration zone is within designated wilderness, we encourage the use of managed wildfire for resource benefit within protection zones as well, where feasible. North et al. 20122 describes the necessity of using managed wildfire from natural ignitions to achieve fire restoration objectives.	Wildfire management strategies and tactics are assessed at the time of each wildfire start. Full suppression, confine/contain, monitoring, and management to meet resource objectives are available management options for all strategic fire management zones.
4	11	7.2	Fire and Fuels	Prescription	We ask the INF to think big when considering the range of available tools for prescribed burning and root fire restoration goals in the historic fire regime and fuel burdens within specific habitats	This project uses a wide range of tools including fire and mechanical treatments for all target vegetation types. Existing conditions will be assessed, and implementation will proceed to meet specific objectives on the ground.
4	12	8.6	Implementation	Prioritization	In order to fully restore fire return intervals and burn the acreage necessary for landscape restoration (140k acres per decade) the use of fire as first entry must be used. Reports related to the proposed action should detail how the Forest will use fire as first entry to achieve acreage goals. Alternatively 2,000-5,000 acre units will need to be planned, which seems unlikely in the near future. A plausible first step to transitioning to first entry fire is determining and mapping where such places are possible on the Forest.	The Inyo National Forest intends to use broadcast burning for first entry as much as possible. The primary tool for this project is prescribed broadcast fire with secondary tools (e.g., hand thinning, mowing) for fuel rearrangement to meet desired conditions.

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4	13	15.3	Vegetation	Prescription	We were disappointed to see the lack of disclosure in the proposed action that expanding fire will result in some tree mortality. The proposed action focuses on the use of low to moderate severity fire, when in fact science supports the necessity for variable mixed severity fire. Studies of the natural range of variation in Jeffrey pine and red fir forests estimate that pre-settlement high severity proportions in these forest types ranged from 5-16% (Safford and Stevens 2017)3. In lodgepole pine forests, scientists acknowledge the average high severity proportion to be as high as 24% (Meyer and North 2019)4. At appropriate scales and frequencies, high severity fire can provide numerous ecosystem benefits by creating landscape heterogeneity, and by creating biodiverse complex early-seral forests. The Forest would benefit from stating up front that killing some trees with fire is acceptable and well within fire regimes on these landscapes. It is better to disclose such intent early on and give full transparency to the public.	Please see Appendix A, which details the proportion of high severity patches and size distribution based on the literature cited.
4	14	8.5	Implementation	Staffing/Budget	Currently staffing is a major barrier to successfully achieving fire restoration objectives on the Forest. We strongly encourage the hiring of a fuels planner prior to implementation of this CE. We also encourage the forest to consider a CalFire model of dedicated prescribed fire implementation teams specifically trained in Rx. This will allow the Forest to take advantage of burn windows that occur when INF/BLM employees are committed to other incidents. Possibly as the forest moves forwards demonstrating to the region the need for fuels funding the cultural shift can be made dedicated prescribed fire crews.	The Inyo National Forest welcomes the support of cooperating agencies and our partners. Our workforce, comprised of permanent, temporary and seasonal staff, is determined by the annual federal budget allocation to the USFS.
4	15	17.1	Wildlife	Design Criteria/Management Requirement	Limited Operating Periods (LOPs) can make it difficult to conduct spring burns. Spring fire events were a relatively rare occurrence in the Sierra Nevada historically, but due to air pollution and population issues, spring burn windows are being used more and more on the Forest. On the INF spring fire windows should be used outside of special species habitat, and the forest should conduct as much fall burning and expanded winter burning whenever possible.	To achieve project objectives this project burning may occur in any season and the project will include plan components for songbirds such as; TERR-FW-DC-06 will provide for ground nesting, shrub nesting, and cavity nesting birds. All incidental sightings of bird nest sights will be buffered and documented. Also, SPEC-FW-STD-01 applies here - "Design features, mitigation, and project timing considerations are incorporated into projects that may affect occupied habitat for at-risk species."

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4	16	17.1	Wildlife	Design Criteria/Management Requirement	...prescribed burning within Marten and Goshawk habitat should be designed to result in a 5% or less reduction in canopy cover, averaged over the treatment unit. Specific requirements should be put in place for large snags (15'' DBH) and downed logs (30'' DBH) retention. Fuels objectives in these habitats should be for low to moderate fire severity. Snag blasting should be avoided in these habitats. Of particular concern is the absence of guidance for Northern Goshawk protections under the new INF plan. We urge you to still consider design features to protect Goshawks within the forest's prescribed burn work.	The objective of the project is prescribed burning with low and moderate severity. There will be some removal of large hazard trees and smaller trees as needed to achieve prescribed burning desired affects. This project incorporates direction from the FP in old forest habitats as outlined for in Table 3 of the Forest Plan (p.18) to retain clumps of large trees, snags, and logs which support important marten and goshawk old forest components. Furthermore, the project will implement plan components such as TERR-FW-STD-01 and SPEC-FW-GDL-1 that protect marten and goshawk.
4	17	13.1	Sensitive Plants	Design Criteria/Management Requirement	...pre-treatment surveys for rare plants should be conducted and sensitive plants flagged for avoidance.	See response to comment #79.
4	18	15.4	Vegetation	Design Criteria/Management Requirement	Although the INF has not salvage logged in many years, we still recommend including salvage logging standards	Desired conditions for this project are ecologically based and the Inyo does not intend to create extensive high severity patches that would contribute to economically viable timber salvage. The need for salvage logging will be assessed as environmental conditions arise and will be analyzed in a separate NEPA.
4	19	16.1	Watershed	Design Criteria/Management Requirement	We support design criteria for no direct lighting in riparian vegetation and habitats as it is fairly common practice to allow fire to back into these areas creating less intense fire effects.	The following design criteria was developed for direct ignition within RCAs: Backing fire is preferred in Riparian Conservation Areas (RCAs) over direct ignition. Where possible avoid broadcast and underburn prescribed fire ignition within RCAs (except as noted below during fireline development). When designing treatments specifically targeting riparian vegetation (e.g. riparian stringers in Southern Sierra), ignition patterns and locations within RCAs will be designed with the Forest Watershed Specialist and Wildlife/Aquatic Biologist to ensure RCA objectives and desired conditions are met. Fire effects in RCAs should be consistent with a low to moderate intensity backing fire, with an overall objective of a low soil burn severity.
4	20	16.1	Watershed	Design Criteria/Management Requirement	Within riparian and meadow habitats please include best management practices for erosion prevention, soil protection and maintenance of water quality such as those stated for the SNF (PA, p.9). Van Der Water and North's (2011) research suggest that efforts need to be made to carefully reduce fuel in riparian areas to prevent severe fire effects.	Riparian areas are included in the target vegetation types to maintain and improve the historic fire regime in these ecosystems and, in turn, reduce fuels and potential for severe fire effects. National watershed Best Management Practices, Forest Plan standards & Guidelines and project specific design criteria will be used to prevent soil erosion and protect soil and water quality.

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4	21	11.1	Range	Design Criteria/Management Requirement	A large area of the proposed area overlaps with active grazing allotments, particularly sheep. These areas should be rested after burning until native perennial grasses return, typically a 2-3 year period or longer during periods of drought.	The Inyo National Forest Land Management Plan (2019) includes guideline RANG-FW-GDL 01 " If recovery of desired vegetation conditions and related biophysical resources are necessary in recently burned areas, then rest from livestock grazing". At a minimum, burned areas will be assessed for understory vegetative recovery prior to livestock grazing in areas exposed to prescribed fire.
4	22	5.1	Cultural Resources	Design Criteria/Management Requirement	Include design features for protection of Piaga trees and associated cultural sites. The forest did a good job of protecting these sites on the Springs Fire and we wish to see these practices continue	Thank you for your support. Project design criteria include measures to ensure cultural resource protection needs are identified and implemented.
4	23	10.5	NEPA	Prescription	...we understand the mechanical treatments are outside the scope of this CE and such design criteria should reflect that	See response to comment #6.
4	24	9.1	Invasive Species	Design Criteria/Management Requirement	We are concerned about a general approval for mowing because of our observation of Cheatgrass proliferation in previously mowed fuels treatment units.	The Inyo National Forest will monitor mowed sites to evaluate concerns regarding the potential introduction and spread of cheatgrass. The bulk of mowing fuels treatments in the recent past on the Inyo National Forest was implemented in vegetation types (e.g., sagebrush steppe) that are not targeted for treatment in this project.
4	25	7.3	Fire and Fuels	Monitoring	We question whether mowing and mastication are needed in many of the units in Jeffrey Pine forest and ask that if the Forest moves forward with this tool, it does so cautiously, with a high level of monitoring, mitigation measures, and possibly use a small pilot area first to study the effects.	Mowing is intended to increase separation between understory vegetation and coniferous overstory to reduce potential for crown fire initiation. This treatment may implement on up to 50% of coniferous vegetation types targeted for treatment. The Inyo National Forest will monitor fire behavior in treated and control plots where mowing is used to assess the effects of of this treatment on flame height, bole scorch, and tree mortality. Mowing may also be used to prepare lines for firing operations. This project does not include mastication, which is a tool commonly used in a variety of vegetation types across the western United States.
4	26	5.2	Cultural Resources	Prescription	We encourage and fully support the INF engaging the five tribal nations within the plan area and discussing the use of Traditional Ecological Knowledge on the forest. Beyond TEK being built into burn plans, tribal partnerships can build the tribe's role in planning and implementing cultural resource driven prescribed fire, strengthen tribal relationships with the Forest and possibly bring positive economic benefits to tribal members.	The Inyo National Forest engaged local Tribes in project planning early and will continue to consult with them throughout project implementation. We welcome the assistance of any future established local tribal wildland fire crews and the opportunity to collaborate on mutually beneficial treatments.

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4	27	8.1	Implementation	Tribal Involvement	If supported, the establishment of a stand-alone (tribal) prescribed fire crew to work alongside the INF as contractors should be explored. Although we understand cultural resources burning may not align exactly with burn plans or windows, whenever possible collaboration with tribal partners to expand burning on current and ancestral lands should be used.	We would welcome the assistance of any future established local tribal wildland fire crews and the opportunity to collaborate on mutually beneficial treatments. See also response to Comment 87.
4	28	8.4	Implementation	Air Board	A major barrier to achieving fire goals within this proposed action is the restrictions placed on air quality and smoke management by Great Basin Unified Air Pollution Control District (GBUAPCD). ... We are encouraged by conversations happening between GBUAPCD and the Forest regarding the current MOU. We seek more information and discussion of how the air board will be incorporated into planning for prescribed fires through this proposed action.	The Inyo National Forest is open to collaborative discussions and has drafted a project implementation plan which includes cooperating agency involvement in treatment design, implementation, and monitoring. The GBUAPCD is considered a cooperating agency and is in frequent contact with the Inyo's fire and aviation staff.
4	29	8.2	Implementation	Public Involvement	As discussed with Forest staff, we welcome the opportunity to participate and help plan the assembly of an annual review team... Such a team, perhaps modeled after the Dinkey Collaborative, would meet annually to review yearly projects and consider changes or input, and perhaps contribute to upcoming burn plans. The team could also be tasked with determining whether individual projects under the CE are meeting Desired Conditions and moving targeted towards NRV. This would be determined through the Monitoring Plan which, given our capacity, we may consider helping to implement on the ground.	The Inyo National Forest is open to working collaboratively on this project and began drafting an implementation plan for this project in August 2019. This plan includes collaborative group involvement, treatment prioritization criteria, and monitoring plan components and guidelines. The project implementation plan will be posted to the project website in the near future.
4	92	7.1	Fire and Fuels	Analysis	The use of mastication as a pre-fire tool in Eastern Sierra forests is not well supported by the best available science. To our knowledge, no studies exist that document fire behavior following mastication in the Eastern Sierra. In fact shrubs can work in favor of burning when conditions are right, such as after rain or snow events when shrubs act as heat sinks, providing more variability for fire effects. Furthermore, mowing creates fuel loading on the forest floor, which stalls ecological processes such as decomposition, which is likely slower than on westside forests. Mastication can also increase fire risk, possibly at a greater level than the intact, live brush.	This project does not include mastication, which is a tool commonly used in a variety of vegetation types across the western United States. Mowing is intended to increase separation between understory vegetation and coniferous overstory to reduce potential for crown fire initiation. This treatment may implemented on up to 50% of coniferous vegetation types targeted for treatment. The Inyo National Forest will monitor fire behavior in treated and control plots where mowing is used to assess the effects of this treatment on flame height, bole scorch, and tree mortality.
5	30	10.2	NEPA	Consensus	I am strongly supportive of this document's programmatic approach to enabling more fire application on the public forest lands of the Inyo.	Thank you for supporting this project.

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5	31	8.2	Implementation	Public Involvement	I do have concerns that site specific public knowledge and notice stands to be lost in the shuffle. To help design the best possible projects while building the public support necessary to greatly ramp up the level of fire on the landscape, I would offer that the Forest hold field trips each Fall or Spring into the areas proposed for treatment the following season. Said trips should also visit past projects so people may see the results interpreted first hand. At the very least, the public should be made aware each year of what polygons of public forest land are being considered for treatment and afforded the opportunity to share site-specific comments and input.	The Inyo National Forest agrees that continued public involvement in this project is essential. The project's interdisciplinary team is drafting an implementation plan that describes the different stages of project implementation and roles and responsibilities of the public, tribes, cooperating agencies and cooperative groups. Field trips to treated and untreated sites may occur as part of this process, the timing of which will depend on staffing.
5	32	9.1	Invasive Species	Design Criteria/Management Requirement	The document is silent with regard to one of the greatest threats facing the integrity of our local forest ecosystems: invasive weedsweeds change the very character of the landscape and deeply influence fire behavior.	Design criteria and monitoring will be incorporated into the proposed action to minimize the risk of introduction and spread of invasive plants. A noxious weed risk assessment will also be completed as part of project analysis.
5	33	9.2	Invasive Species	Analysis	...this project should include an analysis of proposed actions on the current and future population of invasive weeds	A noxious weed risk assessment will be completed as part of project analysis.
5	34	7.2	Fire and Fuels	Prescription	..actions such as fire line construction and especially mowing have the potential to cause weed explosions in areas of little to no current weed infestation.	Design criteria and monitoring will be incorporated into the proposed action to minimize the risk of introduction and spread of invasive plants. A noxious weed risk assessment will also be completed as part of project analysis.
5	35	11.1	Range	Design Criteria/Management Requirement	When allowed to graze immediately after, and in some cases during the course of, prescribed fire treatment activities, livestock's potential to introduce invasive weeds explodes. Please include a proposal to rest from grazing any and all treatment areas for a period of at least 5 years immediately following any fire or vegetation treatment.	See comment #21.
5	36	7.2	Fire and Fuels	Prescription	The document is also silent on the potential integration of what used to be termed " fire use ." ...To fully enable putting fire on as many acres as possible this document should include analysis and authorization for fire use as part of its current programmatic approach to prescribed fire.	The Inyo National Forest Land Management Plan (2019) does not prohibit management of naturally ignited wildfires to meet multiple objectives, including natural resource benefit. This management option was analyzed in the Forest Plan EIS and further analysis in this project is unnecessary. Because natural fire start timing and location are unpredictable, this project will compliment any opportunity to manage unplanned ignitions and target vegetation NRV to allow for greater opportunity to manage natural ignitions based on risk analysis.

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5	37	17.1	Wildlife	Design Criteria/Management Requirement	...the document fails to address or articulate measures for project design and implementation to protect existing wildlife populations and habitat .	This project includes design features to protect at-risk species and their habitat. Fuels reduction is designed to achieve desired conditions as well as creating landscapes resilient to loss from catastrophic wildfire which indirectly protects wildlife habitats.
5	38	17.1	Wildlife	Design Criteria/Management Requirement	...project components to protect large down wood and existing large stumps in project areas should be articulated.	This project will follow the Forest Plan which has direction which protects downed woody debris and vertical snags and large trees. In areas of old forest habitat the Forest Plan has a greater emphasis to protect these features such as clumps of large trees, snags, large logs, and decadent older trees are maintained on the landscape in sufficient numbers to benefit wildlife and are distributed throughout the planning area before and after disturbances. Relevant forest plan direction TERR-OLD-DC-05, 06, and 07 addresses this comment. "01 Old forests are composed of both vigorous trees and decadent trees. . 02 Large snags are scattered across the landscape, generally occurring in clumps rather than uniformly and evenly distributed, meeting the needs of species that use snags and providing for future downed logs. 03 Coarse woody debris is distributed in patches and the density of large downed logs varies by vegetation type. Surface dead wood levels are sufficient to provide for legacy soil microbial populations."
5	39	17.1	Wildlife	Design Criteria/Management Requirement	Future iterations of this document and specific project planning and implementation must recognize the importance of retaining existing snags for their myriad ecological benefits.	Relevant forest plan direction TERR-OLD-DC-05, 06, and 07 addresses this comment. "01 Old forests are composed of both vigorous trees and decadent trees. Clumps of large trees, snags, large logs, and decadent older trees are maintained on the landscape in sufficient numbers to benefit wildlife and are distributed throughout the planning area before and after disturbances. 02 Large snags are scattered across the landscape, generally occurring in clumps rather than uniformly and evenly distributed, meeting the needs of species that use snags and providing for future downed logs. 03 Coarse woody debris is distributed in patches and the density of large downed logs varies by vegetation type. Surface dead wood levels are sufficient to provide for legacy soil microbial populations."
5	40	8.1	Implementation	Tribal Involvement	I hope a method for incorporating traditional ecological knowledge in site-specific project design will be included in future iterations of this project	Thank you for the insightful comment. This project in fact includes design criteria to incorporate TEK into implementation strategies where possible.

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5	41	7.2	Fire and Fuels	Prescription	Finally, the document is silent on potential treatments for one of the Inyo’s most fire-threatened forest habitats: broadleaf-conifer riparian forestsI would offer that the document expand its discussion of aspen to include riparian broadleaf forests (black cottonwood, alder and water birch) for analysis and treatment.	Riparian areas, including broadleaf-conifer riparian forest, have been added to the target vegetation types.
5	42	15.3	Vegetation	Prescription	Within these riparian corridors, protection of targets such as black cottonwood or alder may best be achieved not through fire but thoughtful application of hand felling of encroaching white fir and lodgepole.	Hand thinning and pile burning is included in the Proposed Action.
5	43	10.1	NEPA	Alternatives	The discussion concluding the Purpose and Need section appears to unnecessarily attempt to scapegoat Wilderness and other designations for a perceived lack of mechanized treatment potential. These designations don’t outright say, “No!” A deeper reading of both the spirit and letter of these designations reveals they actually simply ask, “Why and what tools are necessary.” These designations require a deeper dive analysis-wise for good reason....The final document should revisit and remove or re-word this language framing designations as limiting.	Thank you for your thoughtful comment. The Purpose and Need will be revised to reflect prescribed fire as the tool of choice due to the natural disturbance regime and terrain of the Inyo.
5	44	7.3	Fire and Fuels	Monitoring	When preparing design features and an implementation plan during site-specific project analysis, as discussed in the third paragraph, it is critical that this plan include a section on restoration and monitoring after burning is complete.	The project Implementation Plan includes monitoring and IDT process to identify site specific treatments.
5	45	10.6	NEPA	Land Designations	Does this document also cover actions proposed for designated Research Natural Areas? There are at least two in the project area: Indiana Summit RNA (Jeffrey Pine) and Sentinel Meadow RNA (Limber Pine). Also, does this document propose actions within the Mono Basin National Forest Scenic Area and designated Wild & Scenic River corridors?	RNAs, National Scenic Areas, and Wild & Scenic River corridors outside designated Wilderness and the Inyo and White Mountains are included in this project
5	46	7.4	Fire and Fuels	Design Criteria/Management Requirement	Actions for restoration of handlines and any roads, parking areas, and other disturbance into unroaded portions of the project area must be called out and programmed for implementation in the project planning phase.	Each planned burn will include requirements for restoring firelines and other impacts to prevent motorized access, avoid creation of unauthorized trails, and mitigate potential erosion. Recreation and Watershed Specialists on the project IDT have drafted design criteria to prevent unauthorized use, unauthorized route creation, and prevent soil erosion.

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5	47	9.1	Invasive Species	Design Criteria/Management Requirement	site-specific planning should identify existing weed populations and identify post-project monitoring and treatment measures (including rest from grazing) to ensure the proposed actions do not exacerbate weed infestation.	A weed risk assessment and applicable monitoring and project design features will be completed and developed as part of this project's proposed action and environmental analysis.
5	48	7.2	Fire and Fuels	Prescription	Wherever possible, this project should include a public fuelwood component while articulating a post-project plan for restoration of fuelwood gathering impacts (e.g. route proliferation).	The proposed project area overlaps all of the current and potential fuelwood gathering areas on the Inyo National Forest. Firelines will be rehabilitated and disguised to reduce potential for unauthorized OHV route creation.
5	49	10.2	NEPA	Consensus	The importance placed in this section on “flexibility for implementation” is thoughtful. Please keep this notion in mind as this project moves forward to ensure the resulting document authorizes creative and nimble approaches to achieving the desired goal of fire on the land.	Thank you for supporting this project.
5	50	15.1	Vegetation	Diversity	...include a discussion of how to protect a unique facet of the forest that is often overlooked. Across what many people see as monospecific forest there are often pockets or individuals of different conifer species living far from their brethren well outside their expected range. These outlier conifers represent the ongoing process of landscape level dispersal.	Design criteria will be incorporated into the proposed action to avoid impacts to at-risk species as well as to maintain and enhance special habitats and unique vegetation characteristics of burn units.
5	51	15.4	Vegetation	Design Criteria/Management Requirement	When implementing project work, fire planners, botany staff and crews should be made aware of these outlier conifers that seemingly “do not belong,” and efforts to protect them should be included in site-specific project planning.	Design criteria will be prescribed as appropriate during implementation. See response to comment #50. These criteria will be implemented by individuals completing and/or overseeing work on the ground and monitored based on approved monitoring plans.
5	52	7.2	Fire and Fuels	Prescription	This section (hand thinning & limbing) should be amended to remove the statement that hand thinning will not be used in aspen stands. This seems unnecessarily limiting, as thinning may be required to protect critical habitat trees or trees with cultural value containing arborglyphs.	The Proposed Action will be edited to allow for thinning within aspen treatment areas to protect resource values. Project design criteria include measures to ensure that specific cultural resource protection needs for proposed treatments are identified and implemented.
5	53	7.2	Fire and Fuels	Prescription	...removal of encroaching white fir and lodgepole in broadleaf riparian forests may be our only hope to save our rapidly dwindling broadleaf component along streams like Lee Vining Creek, Laurel Creek, Sherwin Creek and upper Deadman Creek.	All riparian areas, including broadleaf dominated, have been added to the target vegetation types.
5	54	10.2	NEPA	Consensus	The proposed removal of small trees reaching up into old growth is welcome and needed.	Thank you for supporting this project.

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5	55	7.2	Fire and Fuels	Prescription	This section should identify that mowing is the least effective and desirable of all actions proposed. For our plant communities, mowing often creates little more than weed patches that require more and more subsequent treatment. This is especially true when deployed along Forest roads – while it may reduce shrub height in the very short term, the subsequent long-term damage from invasive weeds may outweigh the short-term benefits of mowing.	The Proposed Action will be edited to clarify what stand conditions warrant use of this tool (mowing) and that prescribed burning and hand thinning should be considered as primary and secondary preferred tools.
5	56	7.2	Fire and Fuels	Prescription	Table 1 seems to reflect a troubling trend across the Forest in recent years: very aggressive removal of large, old growth trees and snags anywhere within sight of a road. This somewhat arbitrary removal of locally-limited and ecologically-important trees and snags is evident at the end of the Deadman Creek Road and Glass Creek Road, as well as along Bald Mountain Road where 300+ year old Jeffrey and lodgepole have been cut that showed no outward nor inward sign of threat to the passing public or Forest workforce. There needs to be some thoughtful check placed on the current indiscriminate removal of habitat trees.	TERR-FW-STD-01: Retain conifer trees greater than 30 inches diameter. Inyo National Forest uses Pacific Southwest Region Hazard Tree Guidelines developed by the Forest Health Protection staff to identify and mitigate hazard trees. It will be made clear that it is not the intent to indiscriminately remove habitat trees. As of fall of 2019, the new Forest Plan contains components to address this comment (TERR-OLD-DC-05, 06, and 07).
5	57	7.4	Fire and Fuels	Design Criteria/Management Requirement	I thank the Forest for including a line that firelines “will be rehabilitated in locations where it is necessary.” It is necessary at any and all junctions with existing roads or trails. Unrepaired firelines often become proliferated routes for wheeled recreational travel. This section’s call for restoration should be expanded beyond just firelines to include parking areas and other incursions where natural vegetation and soils are disturbed by project work.	Each planned burn will include requirements for restoring firelines and other impacts to prevent motorized access, avoid creation of unauthorized trails, and mitigate potential erosion.
5	58	15.1	Vegetation	Diversity	Appendix A (JP & SMC)...western white pine is a common associate of Jeffrey pine and deserves to be treated with deference given its locally limited distribution. Additionally, in the Glass Mountains, especially the eastern portion above Sawmill Meadow and up to the ridges, limber pine is a frequent associate of Jeffrey. These two white pines – limber and western white – connote subtle but important variations in habitat characteristics and should be noted in site-specific planning. This section should also include note of outlier conifers and their role in species dispersal and adaption, as discussed above.	Design criteria to protect large and old trees are being developed for this project. The Inyo National Forest is drafting an implementation plan for this project, which includes public involvement in site specific treatment development. Also see response to Comment #50.

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5	59	15.1	Vegetation	Diversity/Ecology	Appendix A (LP & RF)...This section on lodgepole should perhaps be re-written to better describe lodgepole forest on the Inyo. In the Glass Mountains, lodgepole – prior to fire exclusion – seemed to be widely dispersed with many trees achieving great age due to their relative isolation from one another and habit of occupying poor, dry pumice soils. Today, much lodgepole in the Glass creates even aged stands that – as the Springs Fire demonstrated – light up like a torch.	Though the Glass Mountains are dominated by pumice soils, stands dominated by lodgepole in this landscape are departed from this species natural range of variability.
5	60	15.4	Vegetation	Design Criteria/Management Requirement	Measures to protect and retain old growth lodgepole and lodgepole snags should be developed and implemented as part of this project.	TERR-FW-STD-01: Retain conifer trees greater than 30 inches diameter. Relevant forest plan direction TERR-OLD-DC-05, 06, and 07 addresses this comment. "01 Old forests are composed of both vigorous trees and decadent trees. Clumps of large trees, snags, large logs, and decadent older trees are maintained on the landscape in sufficient numbers to benefit wildlife and are distributed throughout the planning area before and after disturbances. 02 Large snags are scattered across the landscape, generally occurring in clumps rather than uniformly and evenly distributed, meeting the needs of species that use snags and providing for future downed logs. 03 Coarse woody debris is distributed in patches and the density of large downed logs varies by vegetation type. Surface dead wood levels are sufficient to provide for legacy soil microbial populations."
5	61	5.1	Cultural Resources	Design Criteria/Management Requirement	Particular measures to protect arborglyphs within stands to be treated should be articulated in this section.	Project design criteria include measures to ensure that specific cultural resource protection needs for proposed treatments are identified and implemented.
5	62	15.3	Vegetation	Prescription	Appendix A (Aspen)...the section should differentiate between snowbank aspen and riparian aspen. Each responds very differently to fire; especially now in our time of climate change. Look at the stands east of Sagehen Summit – the resultant stress from reduced snowpack coupled with ongoing grazing is evident. Honestly, I am unsure if some of the more xeric snowbank groves could regenerate after an intense fire.	The Inyo National Forest is also concerned about aspen in the context of climate change. Both aspen types evolved with and are adapted to fire based on current information. Aspen regeneration has been added to the Monitoring Framework.
6	63	10.2	NEPA	Consensus	We are strong advocates for expanding fire restoration across the Sierra Nevada and the West and welcome the opportunity to engage with the Inyo National Forest to restore fire on a landscape scale	Thank you for supporting this project.
6	64	8.2	Implementation	Public Involvement	We strongly encourage the Inyo NF fire staff and leadership to engage the local community in this fire restoration effort.	The Inyo National Forest is drafting an Implementation Plan which includes public involvement.

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6	65	10.1	NEPA	Alternatives	Best way to implement CE...There should be a clearer discussion of potential impacts (risks and benefits) of restoring fire.	The Decision Memo will include expanded language regarding project benefits.
6	66	8.6	Implementation	Prioritization	Best way to implement CE...Providing more specificity regarding ecological fire-shed assessments that lay out 5-10 years of prioritized areas with flexibility for making changes so the Forest Service, interested stakeholders and the public can support the effort in local communities and more broadly in terms of funding, prep work, communication and outreach support	The Inyo National Forest is drafting an Implementation Plan that includes ongoing involvement of the public, tribal, cooperating agencies, and collaborative groups. A landscape prioritization process is also under development to help guide implementation progress.
6	67	8.2	Implementation	Public Involvement	Best way to implement CE...Building a fire restoration collaborative that includes those interested in expanding and maintaining funding for extended burning, forming year-around Rx fire crews, working on smoke management policy (emissions tradeoffs, smoke science, communication, public outreach, smoke alert notification, etc.), cross-jurisdictional burning, managing longer-term burns that extend beyond the predictive capacity of meteorology forecasting, pre-and-post fire monitoring and the integration of high school students into the project like UC Davis has done with Sage Grouse research and monitoring on the Inyo NF.	The Inyo National Forest welcomes involvement of collaborative groups to implement and monitor this project.
6	68	7.1	Fire and Fuels	Analysis	The scoping document notes that the forest will complete an analysis for prescribed fire potential across the project area but does not include what such an analysis will consider and if it will be available to the public. We strongly recommend that this report and other subsequent documents be developed collaboratively and become the foundational effort of a fire restoration collaborative.	Multiple GIS layers that characterize vegetation and vegetation type potential across the Inyo were used to develop a target vegetation model for this project. This model depicts the potential extent where prescribed fire may be implemented across the Inyo National Forest. Results of this model indicate the Inyo and White Mountain Ranges lack vegetation types that historically experienced high to moderate frequency fire. The interdisciplinary team will use this model to assess project effects to forest resources.
6	69	10	NEPA	NEPA	Besides the report being available on the project web page for the general public, fire and smoke science, public health science and public health protection links should be developed with the GBAQMD and should be included in the project website	The Inyo National Forest is drafting an Implementation Plan that includes ongoing involvement of the public, tribal, cooperating agencies, and collaborative groups. This includes the involvement of GBAQMD to the extent that this agency is interested in participating.

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6	70	8.2	Implementation	Public Involvement	The idea of annual field trips to proposed burn sites and monitoring of post-burn environments would make a great annual event to share project information to build continued support for this effort.	The Inyo National Forest agrees that continued public involvement in this project is essential. The project's interdisciplinary team is drafting an implementation plan that describes the different stages of project implementation and roles and responsibilities of the public, tribes, cooperating agencies and cooperative groups. Field trips to treated and untreated sites may occur as part of this process, the timing of which will depend on staffing. All prescribed burns on the Inyo National Forest are announced through press releases.
6	71	10.1	NEPA	Alternatives	Environmental risks, solid design measures, and thoughtful and transparent risk-taking should be disclosed both in terms of implementing larger burns and disclosing reasonable, science-based scenarios related to NOT doing the project, i.e., what it means (risks to public health, community safety, water quality, wildlife habitat, recreation opportunities, climate resilience, etc.) to live in a fire-departed landscape with high fuel-loading.	The Decision Memo will include expanded language regarding project benefits.
6	72	7.2	Fire and Fuels	Prescription	The Inyo NF-Forest Plan allows for wildfires to be managed for resource benefit in the wildfire maintenance and restoration zones outside of designated wilderness. Since most of the maintenance and restoration zone is within designated wilderness, we encourage the use of managed wildfire for resource benefit within protection zones as well, where feasible, as on the Lake Tahoe Basin Management Unit in their recent revised forest plan.	Wildfire management strategies and tactics are assessed at the time of each wildfire start. Full suppression, confine/contain, monitoring, and management to meet resource objectives are available management options for all strategic fire management zones.
6	73	7.2	Fire and Fuels	Prescription	places previously treated for fuels reduction should be prioritized for fire maintenance—whether from wildfire managed for resource benefits or planned burning	The Inyo National Forest Land Management Plan (2019) includes allows for multiple objective fire management strategies, including resource management and areas recently treated for fuels reduction. This project aims to maintain fire regimes in target vegetation types that have recently been treated for fuels reduction and where these vegetation types are within the natural range of variability. First entry prescribed fire is the preferred treatment tool to meet desired conditions and will be used where vegetation & fuel conditions will achieve this goal.

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6	74	8.5	Implementation	Staffing/Budget	Fire maintenance is a critical part of large landscape fire restoration and must be factored into the budgets, staffing and planning. Historically, this hasn't been the case and then we squander resilience for the sake of the next project down the road. Workforce issues, budgets, social license and accountability are all at play here and need to be addressed together to make and maintain this landscape restoration effort a lasting success	Fire maintenance is included in this project. The Inyo National Forest welcomes the support of cooperating agencies and our partners. Our workforce, comprised of permanent, temporary and seasonal staff, is determined by the annual federal budget allocation to the USFS.
6	75	10.1	NEPA	Alternatives	...there is risk involved in restoring large (often fire regime-departed) landscapes. The only thing riskier is not doing the restoration work.	This project aims to restore and maintain the process of wildfire at a landscape scale and meet many of the desired conditions for target vegetation types described in the 2019 Land Management Plan.
6	76	17.1	Wildlife	Design Criteria/Management Requirement	On the Inyo NF spring burn windows should be used with caution in special species habitat where specialist clearance is achieved.	This project includes a variety of target vegetation types to allow for maximum flexibility across the landscape. The Forest aims to implement prescribed burns compatible with the historic fire regime seasonality but must also increase the pace and scale of vegetation restoration, including spring burning. The Implementation Plan includes resource specialist checklists to foster long-term interdisciplinary involvement in project implementation.
6	77	7.4	Fire and Fuels	Design Criteria/Management Requirement	The forest should conduct as much (in season) fall burning and expanded winter burning whenever possible along with night-time burning whenever possible.	This project includes a variety of target vegetation types to allow for maximum flexibility across the landscape. The Forest aims to implement prescribed burns compatible with the historic fire regime seasonality but must also increase the pace and scale of vegetation restoration. All prescribed burns must take into account fuel conditions, resource availability, and risk management prior to ignition.
6	78	17.2	Wildlife	Prescription	A stated goal in the scoping letter is to increase age class diversity including the increase in the proportion of old forest (p. 4) (large diameter trees) and early seral age classes. Prescribed burning within Marten and Goshawk habitat should increase these important habitat elements and reduce canopy where it fosters fire resilience while supporting the other values stated above	The objective of the project is prescribed burning with low and moderate severity. There will be removal of large hazard trees and smaller trees as needed to achieve prescribed burning desired affects. Small patches of high severity burn are allowed and may occur reducing the canopy in small patches. This project incorporates direction from the Forest Plan in old forest habitats as outlined for in Table 3 of the Forest Plan (p.18) to retain clumps of large trees, snags, and logs which support important marten and goshawk old forest components. Furthermore, the project will implement plan components such as TERR-FW-STD-01 and SPEC-FW-GDL-1 that protect marten and goshawk.

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6	79	13.1	Sensitive Plants	Design Criteria/Management Requirement	In compliance with the Forest Plan’s plan components, pre-treatment surveys for rare plants should be conducted and sensitive plants flagged for avoidance unless they need appropriate fire for their own propagation regime, in the fire seasonality they evolved with.	Design criteria specific to surveys and avoidance measures for at-risk plant species will be included in the project.
6	80	17.2	Wildlife	Prescription	We’d like to see a statement that when larger, fire-killed trees may occur during the project and they remain on site.	The Inyo National Forest uses Pacific Southwest Region Hazard Tree Guidelines developed by the Forest Health Protection staff to identify and mitigate hazard trees. The Proposed Action will be revised to stress only hazard trees posing an eminent threat to human life will be felled and any trees felled through project implementation will remain onsite.
6	81	16.1	Watershed	Design Criteria/Management Requirement	Within riparian and meadow habitats please include best management practices for erosion prevention, soil protection and maintenance of water quality such as those stated for the SNF (PA, p.9)	National watershed Best Management Practices, Forest Plan standards & Guidelines and project specific design criteria will be used to prevent soil erosion and protect soil and water quality.
6	82	10.5	NEPA	Prescription	Van Der Water and North’s (2011) research suggest that efforts need to be made to carefully reduce fuel in riparian areas to prevent severe fire effects.	Riparian areas are included in the target vegetation types to maintain and improve the historic fire regime in these ecosystems and, in turn, reduce fuels and potential for severe fire effects.
6	83	16.1	Watershed	Design Criteria/Management Requirement	We support design criteria for no direct lighting in riparian vegetation and habitats as it is fairly common practice to allow fire to back into these areas creating less intense fire effects.	The following design criteria was developed for direct ignition within RCAs: Backing fire is preferred in Riparian Conservation Areas (RCAs) over direct ignition. Where possible avoid broadcast and underburn prescribed fire ignition within RCAs (except as noted below during fireline development). When designing treatments specifically targeting riparian vegetation (e.g. riparian stringers in Southern Sierra), ignition patterns and locations within RCAs will be designed with the Forest Watershed Specialist and Wildlife/Aquatic Biologist to ensure RCA objectives and desired conditions are met. Fire effects in RCAs should be consistent with a low to moderate intensity backing fire, with an overall objective of a low soil burn severity.

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6	84	11.1	Range	Design Criteria/Management Requirement	A large area of the fire restoration proposal overlaps active grazing allotments, particularly sheep. These areas should be rested after burning until native perennial grasses return, typically a 2-3-year period or longer during periods of drought.	The Inyo National Forest Land Management Plan (2019) includes guideline RANG-FW-GDL 01 " If recovery of desired vegetation conditions and related biophysical resources are necessary in recently burned areas, then rest from livestock grazing". At a minimum, burned areas will be assessed for understory vegetative recovery prior to livestock grazing in areas exposed to prescribed fire.
6	85	10.5	NEPA	Prescription	We understand the mechanical treatments are generally outside the scope of this CE and such design criteria should reflect that, other than mastication and some felling of ladder fuel trees for pile burning before broadcast burning an area, mechanical treatments are limited.	This project uses a wide range of tools including fire and mechanical treatments for all target vegetation types. Existing conditions will be assessed, and implementation will proceed to meet specific objectives on the ground.
6	86	8.1	Implementation	Tribal Involvement	we request the Inyo NF consider including cultural burning projects within this larger effort, in collaboration with Native American community members where timing, intensity and location of fires may provide cultural benefits while achieving the INF ecological objectives	Thank you for the thoughtful comment. Project design criteria include collaborating with tribes on the implementation of mutually beneficial prescribed fire restoration treatment(s).
6	87	8.3	Implementation	Interagency	Based on the efforts of the Fire MOU Partnership, we would hope the Inyo NF will reach out to local CAL FIRE Units, BLM and Native American partners to expand capacity and training for larger landscape burn efforts. It is all one fire-associated ecosystem where fire doesn't care much about human ownership patterns or area response authorities	The Forest works with adjoining agencies to plan and carry out projects and will continue to include our partners to increase capacity through training when and where appropriate. INF must follow national qualification standards for those implementing fire-related projects.
6	88	8.4	Implementation	Air Board	We are encouraged by conversations happening between GBUAPCD and the Inyo National Forest regarding the current Smoke Management MOA. The MOA (version signed in 2001) is very limiting of planned and unplanned fire.	Thank you for supporting this project.
6	89	2.1	Air	Burning	We support the concept of "living with fire" and avoiding or de-linking from the misguided notion that <u>not</u> burning is going to protect the public's health. This is where emissions trade-offs must enter the discussion. Its not that Smoke Management doesn't matter or that working together collaboratively to protect public health isn't important, but it also matters that we recognize the key aspects of the ecosystem one lives in which is essential to understanding and promoting well-planned fire restoration	Thank you for supporting this project.

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6	90	2.1	Air	Burning	We also must be transparent about burning for ecological goals of resilience that will limit mega-emissions over the long run. This will require much longer burn windows and a discussion about the emission baselines being the fire regime level of smoke. See (Schweizer and Cisneros 2017) <i>Forest fire policy: change conventional thinking of smoke management to prioritize long-term air quality and public health</i>	The Decision Memo will include expanded language regarding project benefits.
6	91	8.4	Implementation	Air Board	The Governor, CAL FIRE, and the California Air Board's 500,000-acre/year commitment is a statewide attempt to expand needed fire restoration and resilience and expresses an understanding that surface and ladder fuels play a key role in driving fire behavior. The current Smoke Management MOA should be renegotiated to resolve these issues which are far better understood today.	Inyo National Forest Fire Staff are working with GBUAPCD to improve the current MOU and allow for a wider range of prescribed fire opportunities.